



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

April 14, 2011

Regulatory Branch

Mr. Jeff Sawyer
Washington State Department of Transportation
5720 Capitol Boulevard
Post Office Box 47440
Tumwater, Washington 98504-7440

Reference: NWS-2009-211
WA Dept. of
Transportation
(McMillan Bridge)

Dear Mr. Sawyer:

The Corps asked WSDOT, as the applicant for a DOD permit to conduct an analysis of the alternatives to demolition of the McMillan Bridge. In response, we received your recommendation dated February 15, 2011, to demolish the McMillan Bridge. This recommendation included an alternatives analysis titled "SR 162 Puyallup River Bridge Replacement, McMillan Bridge Preservation Alternative Analysis" dated January 18, 2011. It is the Corps responsibility "for ensuring that its content meets applicable standards and guidelines" [36 CFR § 800.2(a)(3)]. The Corps has reviewed this analysis and has determined that WSDOT has not provided sufficient information in the analysis of alternatives to justify removal of the bridge.

WSDOT's basis for the decision to demolish the bridge was the demolition would "keep with WSDOT's mission to keep people and business moving by operating and improving the state's transportation system". The WSDOT mission statement does not in and of itself provide justification for demolition of the bridge and does not eliminate the need to seriously consider other alternatives. The fact that WSDOT has preserved bridges in place, would seem to render this justification invalid. In addition, the policy of the State of Washington encourages state agencies to protect and preserve historic structures. The WSDOT Environmental Preservation Manual (section 456.01) states "It is WSDOT policy to avoid adverse effects, where practical, to cultural resources in planning, constructing, operating, or maintaining the state's transportation system. These resources include prehistoric and historic archaeological sites, historic structures, and traditional cultural properties. If it is not practical to avoid adverse effects, WSDOT will minimize and mitigate effects."

The Corps as the lead Federal agency is prohibited from authorizing an activity that may affect an historic property listed, or eligible for listing, in the National Register of Historic Places until the District Engineer has complied with the provisions of 33 CFR part 325, Appendix C.

To complete the required consultation, you must provide additional information on the alternatives including specifics on why leaving the bridge in place as a monument or public access feature, is not feasible. Each alternative should have this analysis and separate rationale provided for each option that is not recommended by WSDOT as the proposed action. The analysis must also address issues and concerns raised by all the consulting parties. Provide a list of the issues and concerns raised by the parties and a response to address the concerns raised.

In order to assist you in addressing the alternatives, the Corps has the following specific comments on the January 18, 2011 analysis:

1. In the background section of the Executive Summary, it is stated that the McMillin Bridge is functionally obsolete. This statement is not explained or justified anywhere in the document. Define why the bridge is functionally obsolete either in the executive summary or within the alternatives, and explain how this statement affects the decision of dismantling or preserving the bridge.
2. The public involvement process was described well, but it needs to include a summary of the comments and objections raised by the consulting parties and a response to address those concerns.
3. A specific reason to eliminate each alternative needs to be provided for each alternative in the analysis.
4. As stated earlier by the Corps letter dated December 8, 2010, the project schedule should not be considered as a means for eliminating an alternative for the Section 106 review process. Unless you can explain a reason for including this in the consideration, project schedule delay is not a valid consideration for demolishing an historic bridge.
5. In the alternatives that leave the bridge in place, provide additional information on why the environmental considerations are a concern including details on the effects of the pinch point on the 100-year floodplain, and concerns with the bridge being lower than the six feet above base flood elevation. Also additional information should be included on the statement that there will be impacts to spawning habitat. Provide documentation of fish spawning in this area. Also, justify the statement of redds being scoured. Are there documented redds in the area around the bridge piers that would be replicated upon removal of the bridge? WSDOT should provide any evidence, studies or models that demonstrate what impacts are expected to occur to fish and wildlife habitat and additional erosion or flooding that may result by leaving the bridge in place.
6. The statement under Risk in Alternatives 1, 3 and 4 that the Puyallup Tribe of Indians is “opposed to preservation in place which has the potential to result in schedule delay” needs additional explanation. The timelines shown in Table 1 have the shortest schedule

delay for the preservation options. It is also not clear why the Puyallups would be concerned about a project delay.

7. Page 3, Risk Considerations: Additional details on liability and preservation of the structure need to be included in this analysis. This general statement does not provide details necessary to justify demolition.
8. For Alternative 2, the opening statement says the new bridge would be constructed prior to moving the McMillan Bridge, but the second bullet appears to use the requirement of road closure as the reason that the bridge cannot be relocated. This is inconsistent. There is also a general statement that the 38 foot bridge would be traveling on a 30 foot road. Please complete these statements to include why these issues may make the option infeasible.
9. For Alternative 2, the third bullet provides no statement of why this alternative is not feasible. As stated in the analysis, the Bridge for Kids Steering Committee is receptive of receiving the bridge. The only statement of concern is the bridge may need repairs once it arrives to the new destination. This appears to be a feasible option that would be preferable to demolition. In the review of this alternative, it needs to be clear if moving the bridge is a viable alternative, and if so, why it is not the WSDOT proposed alternative.
10. Alternatives 3 and 6 provide a list of Engineering Considerations, but there is no conclusion provided for any of the considerations. It is not clear why these are issues or concerns to WSDOT.
11. Alternative 4, it is still unclear why the County would have to assume ownership of the bridge and responsibility of the trail. Comments provided by the consulting parties have stated the Timothy Bridge on State Route 12 west of Clarkston, in Asotin County is an example of a bridge that was left in place and bypassed by WSDOT with a new alignment.
12. Alternative 6, 5th bullet on page 19 discusses a new bridge being built further downstream to make room for the new shafts. Please explain this statement. It is unclear what new bridge you are referring to since this alternative is retrofit of the existing bridge. For the 8th bullet, why would this alternative require raising the bridge when the other alternatives to leave the bridge in place did not have this requirement?

Please provide the Corps with an alternatives analysis that includes additional information on all possible alternatives, a response to the concerns and issues raised by the consulting parties during the public review process, and the preferred alternative proposed by WSDOT. Once the Corps receives this additional information, we will review it for compliance with 106, and

determine if the alternatives' analysis data and the rationale for and against all of the alternatives is sufficient.

If you have any questions, please call me at (360) 407-6912, or via e-mail at sman461@ecy.wa.gov.

Sincerely,

Sandra Manning, Project Manager
Regulatory Branch